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FCC Mail Room

Annual 47 C.F.R. & 64.2009(e) CPNI Certification

EB Docket 06-36

Date filed: January, 5, 2011

Name of company covered by this certification: DelTel, Inc.

Form 499 Filer ID: 823484

NAME OF SIGNATORY: Kirk E. Waldfogel

Title of signatory: President and CEO

I, Kirk E. Waldfogel, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, record keeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47.C.F.R. & 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Date _____

Kirk E. Waldfogel
President and CEO
DelTel, Inc.

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List A B C D E

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DELTEL, INC.**STATEMENT OF CPNI COMPLIANCE PROCEDURES****FCC Mail Room**

DelTel provides a wide variety of telecommunications services primarily to small and medium-sized enterprises and multi-location customers.

DelTel does not currently use CPNI for marketing purposes but has adopted a policy governing its use that conforms with the FCC rules. Specifically, DelTel will provide regular written CPNI notices to all customers and will obtain approval from all customers prior to using CPNI for marketing purposes. DelTel will also provide customers with the ability to change or rescind their consent to the company's use of their CPNI at any time. DelTel will draft CPNI notices explaining to customers their CPNI rights in accordance with the FCC's CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices will also provide information on how customers can choose to not receive marketing from DelTel that is based upon DelTel's use of their CPNI. If DelTel uses CPNI to market communications-related services outside of those services to which a customer already subscribes, DelTel will only do so where the customer has granted approval pursuant to instructions in the CPNI notices. DelTel will adopt a recordkeeping system so as to maintain records of customer approval and the delivery of its CPNI notices for at least one year.

DelTel will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. In accordance with the CPNI rules, upon obtaining a customer's oral authorization, customer service representatives of DelTel may access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such DelTel representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

DelTel may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of DelTel, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services.

DelTel does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any third parties for marketing purposes is strictly prohibited by DelTel.

DelTel will maintain records for at least one year of its own and affiliates' sales and marketing campaigns that use customers' CPNI should the company use CPNI for such purposes. DelTel will establish a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules prior to engaging in such campaigns.

All DelTel employees who have access to CPNI receive CPNI compliance training. Each new employee receives CPNI training at new-hire orientation and is required to acknowledge in writing they understand DelTel corporate CPNI policy as required by the FCC. A summary of DelTel's CPNI policies are also included in the company Employee Handbook which is provided to every employee. Annually, all employees are involved in a CPNI refresher training program and required to acknowledge in writing that training was received and understood.

DelTel employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by DelTel. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

DelTel has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) DelTel's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether DelTel has taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. DelTel will submit the above letter even if it offers other methods by which its customers may opt-out.

DelTel has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, DelTel will notify affected customers after waiting the relevant time period. DelTel will maintain a record of any CPNI-related breaches for a period of at least two years.

DelTel has implemented procedures whereby it will not provide CPNI without proper customer authentication for both inbound telephone calls and online account access. In order to authenticate a customer's identity prior to disclosing CPNI, DelTel authenticates the customer using a variety of methods. Call detail records are provided to a customer's email address of record or by calling the customer at the telephone number of record, or, if it is an inbound call, only if the customer provides the password associated with the account. DelTel has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. DelTel has implemented procedures to inform customers of changes to the customer's on-line account, address of record, or authentication questions established when the password was set up in a manner that conforms with the relevant FCC rules.